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ROLAND G. RIOPELLE  
MAURICE H. SERCARZ\*

\*ADMITTED IN NY & NJ

February 12, 2024

**BY ECF**

The Honorable Edgardo Ramos  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**Re: *United States v. Markin, et al*, 22 CR 395**  
**Seth Markin - Defendant**

Your Honor:

On January 9, 2024, this Court “So Ordered” our application for a bail modification that permitted the Defendant to travel to Boca Raton, Florida from February 21 through February 24, 2024 for a yoga retreat. (A copy of the Court’s Order approving of the prior bail modification is annexed hereto).

My client has attempted to book roundtrip travel from Trenton Airport to Fort Lauderdale Airport that would permit him to travel on February 21 and return on February 24. Unfortunately, he could not book a return flight that would bring him back on that date. However, the Defendant was able to make reservations on a flight returning from Fort Lauderdale Airport to Philadelphia on February 25, 2024.

Accordingly, we would request that the Defendant’s bail conditions be modified to permit him to make the trip on February 21, 2024 and to return on February 25, 2024.

The Government has no objection to the request herein.

**Conclusion**

For all the reasons set forth herein, we respectfully request that the Defendant be permitted to make the trip described above.

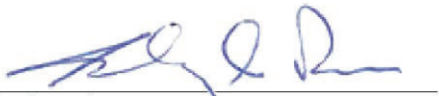
Most respectfully,

/s/ Maurice H. Sercarz

cc: All Parties (by ECF)

USPSC Janitza Gomez (by email)

The application for permission to travel is GRANTED.  
SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Edgardo Ramos', is written over a horizontal line.

Edgardo Ramos, U.S.D.J.

Dated: 2/14/2024

New York, New York